



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 10**

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OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

July 29, 2013

ALCOM Public Affairs  
9480 Pease Avenue, Suite 120  
JBER, Alaska 99506

Re: EPA comments on the Final Environmental Impact Statement for the Alaskan Command's Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, EPA Project #10-066-DOD.

Dear Sir or Madam:

Thank you for the opportunity to review the Final Environmental Impact Statement for the Alaskan Command's Modernization and Enhancement of Ranges, Airspace, and Training Areas in the Joint Pacific Alaska Range Complex, Alaska (CEQ # 20130181). We have reviewed the EIS in accordance with our responsibilities under National Environmental Policy Act and Section 309 of the Clean Air Act.

In our comments on the draft EIS (July 9, 2012), we identified serious concerns with four of the twelve proposed JPARC projects and offered recommendations to address many of our concerns. We also offered suggestions for improving the analysis in the Final EIS.

Based on our review of the final EIS, it appears that many of our concerns have been addressed through revisions to the Final EIS as well as through development of specific mitigation measures that may be selected in the Record of Decision. Specifically, we appreciate the revisions to the impacts table to clearly differentiate among alternatives; the inclusion of the Susitna-Watana Hydroelectric Project in the cumulative effects section; and additional information concerning the generation and management of hazardous materials. We are also pleased that additional communication options are being considered for conveying information regarding training activities to communities and area users.

We believe that ALCOM now needs to commit to the many mitigation measures identified in the Final EIS, particularly to avoid and minimize impacts to flight safety (minimum changed from 500 ft. above ground level to 5,000 ft. AGL), subsistence and recreation users (prohibitions during open seasons), wildlife (life cycle-critical prohibitions) and solitude (minimums and restrictions for certain use areas). We also strongly encourage adoption of all mitigation measures to prevent and minimize, as well as adequately respond to, wildland fires, particularly with the increasing occurrence and severity of wildland fires.

We remain concerned about potential impacts to project area residents, the aviation community, and other stakeholders that may not be ameliorated by the identified mitigation measures. We recommend that the ALCOM develop and rigorously implement an adaptive management program that will allow for real time input from stakeholders (e.g. reports of near misses, sonic booms, small wildland fires,

wildlife disturbances, etc.) to ensure that all implemented mitigation measures are effective and if not, adjusted in a timely manner.

We note that the 18<sup>th</sup> Aggressor Squadron Relocation project is running concurrent with this modernization and enhancement project. Since relocation decisions could affect aspects of this project, we recommend that decisions on those aspects be delayed until the relocation decision is made. At that time, it will be clearer as to whether modifications or further analyses will be needed.

Again, thank you for the opportunity to comment on the final EIS. Please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or [curtis.jennifer@epa.gov](mailto:curtis.jennifer@epa.gov), with any questions you have regarding our comments.

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large, stylized "C" and "R".

Christine B. Reichgott, Manager  
Environmental Review and Sediments Management Unit

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.